

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ASHOT EGIAZARYAN	:	
	:	
v.	:	Case No. 1:11-cv-02670
	:	(PKC)GWG
PETER ZALMAYEV	:	
	:	

DECLARATION OF JAMES P. GOLDEN

JAMES P. GOLDEN, hereby declares under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a shareholder in the firm of Hamburg & Golden, P.C., counsel for defendant Peter Zalmayev, and I submit this declaration in support of Mr. Zalmayev's Motion to Dismiss Counts I through IV of the Amended Complaint.
2. The following true and correct exhibits are attached:
 1. Blacklined amended complaint (prepared by Egiazaryan) showing changes from the complaint.
 2. Judge Gorenstein's January 19, 2012, order regarding the motion to file an amended complaint, entered on Jonathan Lupkin's January 17, 2012, letter.
 3. Zalmayev's answer to the motion to for leave to file an amended complaint.
 4. June 27, 2011, scheduling order.
 5. LDPR's member list (pages 1-3 of 19).

6. Translation of the headings and Egiazaryan entry (no. 6, page 2) (all translated passages circled).
7. Interpol wanted notice for Egiazaryan.
8. Egiazaryan/Gibson Dunn public relations lobbying contract with BGR.
9. February 6, 2011, Washington Post article.
10. March 9, 2011, Washington Post article.
11. May 27, 2011, Washington Post article.
12. Wall Street Journal commentary, October 17, 2011.

/s/ James P. Golden
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Dated: March 30, 2012